

**GOLDENBERG, MACKLER, SAYEGH, MINTZ,
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and Empire TFI Jersey Holdings, LLC (63400-1)

BY: /s/ Keith A. Bonchi
KEITH A. BONCHI, ESQ. (KAB3664)

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

IN RE: : CHAPTER 11
:
PARADIGM ELIZABETH, LLC : CASE NO. 14-24901
:
Debtor : JUDGE: DONALD H. STECKROTH

**NOTICE OF MOTION TO DISMISS THE CASE
AND FOR RELIEF FROM THE AUTOMATIC STAY**

TO: Morris S. Bauer, Esq.
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PLEASE TAKE NOTICE that on **Tuesday, September 9, 2014 at 10:00 a.m.** in the forenoon or as soon as thereafter as counsel may be heard, the undersigned attorneys for the

named Creditors, Osprey Investments, LLC as Assignee of FNA Jersey Lien Services, LLC and Empire TFI Jersey Holdings, LLC as Assignee of US BNK CUST EMPIRE TAX FUND I, shall move before the United States Bankruptcy Court, Martin Luther King Jr. U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07102 before the Honorable Donald H. Steckroth, U.S.B.J., for an Order Dismissing the Case for lack of good faith or, in the alternative, that certain property known as Block 1, Lot 1380.G8 on the Tax Map of the City of Elizabeth, New Jersey is not property of the bankruptcy estate and therefore Granting Relief from the Automatic Stay.

Movant shall rely upon the enclosed Statements of Counsel and the enclosed brief.

Movant requests oral argument.

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PFEFFER, BONCHI & GILL**

Attorneys for Osprey Investments, LLC as Assignee of FNA Jersey Lien Services, LLC and Empire TFI Jersey Holdings, LLC as Assignee of US BANK CUST EMPIRE TAX FUND I

/s/ Keith A. Bonchi
KEITH A. BONCHI, ESQUIRE (KAB3664)

DATED: August 13, 2014